

Sabrina Freeman

From: Mark Wade
Sent: Monday, June 26, 2017 8:57 AM
To: Sabrina Freeman
Cc: Lori Larsh
Subject: 481 HTC done

Validate, certify accuracy, certify.

CONFIRMATION

Congratulations. Your filing has been successfully certified.

Filing 1 was successfully certified on Fri 23 Jun 17 08:57:24 AM EDT by sabrina@havilandelco.com .

SAC : 411780

498 ID : 143002293

Carrier Name : HAVILAND TEL CO

Program Year : 2018

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010> Study Area Code	411780
<015> Study Area Name	HAVILAND TEL CO
<020> Program Year	2018
<030> Contact Name: Person USAO should contact with questions about this data	Lori Tarsh
<035> Contact Telephone Number: Number of the person identified in data line <030>	6208623220 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	llarsh@haviandtelco.com
Form Type	54.313 and 54.422

[illegible]

(300) Unfulfilled Service Request
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	411780
<015> Study Area Name	HAVILAND TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Iori Larsh
<035> Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	llarsh@havilandleco.com
<300> Unfulfilled service request (voice)	0
<310> Detail on attempts (voice)	
<320> Unfulfilled service request (broadband)	0
<330> Detail on attempts (broadband)	

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/ OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@havilandtelco.com
<400>	<p>Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.</p> <p>Offered only fixed voice</p>	
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	<p>Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.</p> <p>Offered only fixed broadband</p>	
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FOC Form 481
OM/B Control No. 3060-0986/OM/B Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@havlantelco.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes 411780ks510.pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations
Data Collection Form

FOC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USA/C should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@havlantel.co.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	411780ks610.pdf

[illegible]

Study Area Code

Study Area Name
<015>

Program Year	<020>
--------------	-------

<030> Contact Name - Person USAC should contact regarding this data

<035>	Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030>	llmarsh@havlantelco.com

[illegible]

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Tori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tlarsh@havlantelco.com
<810>	Reporting Carrier	Haviland Telephone Company, Inc.
<811>	Holding Company	LICIT Corporation
<812>	Operating Company	Haviland Telephone Company, Inc.

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FOC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAO should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<038>	Contact Email Address - Email Address of person identified in data line <030>	Llarsh@haviLandtelco.com
<900>	Does the filing entity offer tribal land services? (Y/N)	No

<910> Tribal Land(s) on which ETC Serves

--

<920> Tribal Government Engagement Obligation

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Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning.
- <923> Marketing services in a culturally sensitive manner.
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1000) Voice and Broadband Service Rate Comparability
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lois Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@haviandtelco.com

<1000> Voice services rate comparability certification

Yes

<1010> Attach detailed description for voice services rate comparability compliance

411780ks1010.pdf

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

411780ks1030.pdf

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@havilandelco.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/ OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@havilandelco.com

411780ks1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <https://portal.havilandelco.com/lifeline>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Retum Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILLAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Tarish
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<038>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@haviandtelco.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b), (c), (d), (e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<input type="text"/>	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/ 1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input type="text"/>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input type="text"/>	
<2024A>	Round 2 Recipient of Incremental Support?	<input type="text"/>	
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<input type="text"/>
<2025A>	Round 2 Recipient of Incremental Support?	<input type="text"/>	
<2025B>	Attach geocoded information for Phase I milestone reports (Round 2 for year three) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	<input type="text"/>
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	<input type="text"/>	

(2005) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FOC Form 481
OMB Control No. 3060-0986/OMB Control No. 3050-0819
July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(EEO5) Rate Of Return Carrier Additional Documentation ☐ ☐ ☐
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010> Study Area Code 411780
 <015> Study Area Name HAVILAND TEL CO
 <020> Program Year 2018
 <030> Contact Name - Person USAC should contact regarding this data Lori Larsh
 <035> Contact Telephone Number - Number of person identified in data line <030> 6208623220 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> llarsh@havilandelco.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}

411780ks3010.pdf

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

No - No New Community Anchors

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

Please Provide Attachment

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}

(Yes/No)

☐ ☒

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☐ ☐

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)

Electronic copy of their annual RUS reports
(Operating Report for Telecommunications Borrowers)

☐ ☐

<010> Study Area Code	411780
<015> Study Area Name	HAVILAND TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Lori Larsh
<035> Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	llarsh@havlanta1co.com

Financial Data Summary

(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service (TPS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

(4005) Rural Broadband Experiment Additional Documentation
Data Collection FormFCC Form 481
OMB Control No. 3060-0986/ OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USA/C should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@haviandtelco.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses Name of Attached Document Listing Required Information of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been planned as of the

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 487
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	411780
<015> Study Area Name	HAVILAND TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Lori Larsh
<035> Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	llarsh@havilandelco.com

TO BE COMPLETED BY THE REPORTING CARRIER. IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or U Recipients	
I certify that I am an officer of the reporting carrier, my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients, and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	HAVILAND TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE
Printed name of Authorized Officer:	Mark Wade
Title or position of Authorized Officer:	Vice-President of Operations
Telephone number of Authorized Officer:	6208625211 ext.
Study Area Code of Reporting Carrier:	411780
Filing Due Date for this form:	07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C § 1001.	

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0086/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	411780
<015>	Study Area Name	HAVILAND TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USA should contact regarding this data	Lois Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@haviandtelco.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or U Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent)	is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier, my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	
Filing Due Date for this form:	
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or U Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier. I have provided the data reported herein based on data provided by the reporting carrier, and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	
Filing Due Date for this form:	
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FOC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<015>	Study Area Name	HAVTLAND TEL. CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lori Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext..
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@havilandtelco.com

<701>	Residential Local Service Charge Effective Date
<702>	Single State-wide Residential Local Service Charge

1/1/2017
17.0

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[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

411780

HAYLAND TEL CO

2018

Lori Larsh

6208623220 ext.

llarsh@villandtelco.com

[illegible]

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/ OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411780
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<030>	Contact Name - Person USAC should contact regarding this data	Lois Larsh
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208623220 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@haviandtel.co.com
<810>	Reporting Carrier	Haviland Telephone Company, Inc.
<811>	Holding Company	LICT Corporation
<812>	Operating Company	Haviland Telephone Company, Inc.

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Bretton Woods Telephone Company, Inc.	120038	Bretton Woods, World Surfer
	Upper Peninsula Telephone Company	310732	Michigan Broadband Services, UPTC, MCBC, Alphacom.net
	Michigan Central Broadband Company	310785	Michigan Broadband Services, MCBC, Alphacom.net
	Belmont Telephone Company	330847	Belmont, LaGrant Connections, LLC
	Cuba City Telephone Exchange Company	330872	Cuba City, LaGrant Connections, LLC
	Central Scott Telephone Company	351125	Central Scott
	CST Communications, Inc.	359032	CST Communications, iWireless
	Dixon Acquisition LLC	351150	Central Scott, Dixon Telephone Company
	Haviland Telephone Company, Inc.	411780	Haviland, Giant Communications, Inc.
	J. B. N. Telephone Company, Inc.	411785	J.B.N., Giant Communications, Inc.
	Western New Mexico Telephone Co., Inc.	492268	WNM Communications
	Central Utah Tel Inc.	502277	CentraCom, CentraCom Interactive
	Skyline Telecom	502283	CentraCom, CentraCom Interactive
	Bear Lake Comm	503032	CentraCom, CentraCom Interactive
	Cal-Ore Telephone Company	542311	Cal-Ore
	Giant Communications, Inc.		Giant
	Alpha Enterprises Limited, Inc.		Alphacom.net
	World Surfer, Inc.		World Surfer
	INTERCOMMUNITY TELEPHONE COMPANY	381616	InterCommunity
	Valley Communications, Inc.		Valley
	Central Telecom Services, LLC		CentraCom, CentraCom Interactive
	LaGrant Connections, LLC		LaGrant Connections, LLC
	WNM Communications Corporation		WNM Communications

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<039>	Contact Email Address - Email Address of person identified in data line <030>	llarsh@havilandelco.com
<810>	Reporting Carrier	Haviland Telephone Company, Inc.
<811>	Holding Company	LTC Corporation
<812>	Operating Company	Haviland Telephone Company, Inc.

[illegible]

File name: 411780ks310.pdf

Haviland Telephone Company, Inc.
Line 310 – Unfulfilled Voice Telephony Service Requests Resolution

As required in 47 C.F.R. § 54.313(a)(3), the following provides the Company's status on providing service to potential customers in 2016:

There were no unfulfilled service requests in 2016 in the service area in which the Company is designated as an ETC so no further documentation is required.

Haviland Telephone Company, Inc.

Line 510 - Compliance with Service Quality Standards and Consumer Protection

As required in 47 C.F.R. § 54.313(a)(5) for High-cost Recipients, the following is a detailed description of how the Company complies with Service Quality Standards and Consumer Protection Rules.

SERVICE QUALITY STANDARDS: The Company abides by the State Commission's requirements for service quality. All required reporting is done with the Company in full compliance of the service quality standard requirements shown in Exhibit A.

CONSUMER PROTECTION RULES:

The Company developed and implemented a Customer Proprietary Network Information ("CPNI") Compliance Manual and has appointed a CPNI Compliance Officer. Annually, the Company requires all employees to certify that they have reviewed and understand the CPNI Compliance Manual and that they understand that any violation of the Company's CPNI procedures may result in disciplinary action up to and including dismissal. The Company files an annual report with the Federal Communications Commission ("FCC") certifying compliance with the FCC's CPNI rules.

The Company also developed and implemented an Identity Theft Prevention Program Manual and has appointed a Red Flag Coordinator. Annually, the Company requires all employees certify that they have reviewed and understand the Identity Theft Prevention Program Manual. Further, employees must certify that they understand that any violation of the Company's identity theft prevention procedures may result in disciplinary action up to and including dismissal.

TITLE

INSERT STATE QUALITY OF SERVICE RULES HERE

THE STATE COMMISSION OF THE STATE OF KANSAS

Before Commissioners: Timothy E. McKee, Chair Susan M. Seltsam John Wine

In the Matter of a General Investigation into Universal Service, Docket No. 191,206-U
Telecommunications Infrastructure, and Quality of Service.

ORDER

NOW, the above-captioned matter comes for consideration and determination before the State Corporation Commission of the State of Kansas (Commission). Having examined its files and records, and being duly advised in the premises, the

Commission finds as follows:

I. Background

1. On August 11, 1994, the Commission issued an Order opening the above-captioned general investigation into universal service, telecommunications infrastructure modernization and quality of service.
2. On February 5, 1996, Commission staff (Staff) filed a Motion to Consolidate Issues from Docket No. 191,206-U into the Competition Docket, Docket 190,492-u. On April 4, 1996, the Commission granted Staff's motion by consolidating all issues from the above-captioned docket, except the quality of service issue, into Docket 190,492-U. Because the quality of service issue involves

many technical and reporting issues, the Commission determined it should remain in the above-captioned docket.

3. On May 17, 1996, Senate Substitute for Substitute for House Bill No. 2718 (1996 Kansas Act) was signed into law. Section 3(l) of the 1996 Kansas Act requires the Commission to "initiate and complete a proceeding to establish

. minimum quality of service standards which will be equally applicable to all local

exchange carriers and telecommunications carriers in the state" not later than January 1, 1997. The 1996 Kansas Act provides for fines between \$100 and \$5,000 for each quality of service violation.

4. On October 2, 1996, the Commission issued an order requesting

comments from facilities-based interexchange carriers regarding how to carry-out House Bill 2728's quality of service provision.

5. On November 12, 1996, Southwestern Bell Telephone Company (SWBT) filed a Motion for Leave to file comments in this docket.

. 6. On November 15, 1996, the Commission granted SWBT's's Motion for Leave to file comments.

7. On December 4, 1996, the Commission received a memorandum from Staff summarizing the comments received from AT&T Communications of the Southwest, Inc. (AT&T), MCI, and SWBT. AT&T stated "quality of service standards" should be required only if competitive market forces do not exist. MCI stated "interexchange carriers are currently subjected to the most rigorous quality of service standards imposed by the marketplace -customer choice." SWBT stated

"customer choice is the most effective quality assurance plan for monitoring telecommunications in Kansas."

II. Discussion

8. Staff agreed with respondents' comments regarding the market's effect on quality of service. Staff stated customers may presently obtain interexchange service from a multitude of interLATA interexchange carriers. Staff also stated Section 6(a) of the 1996 Kansas Act requires that by July 1998, 100% of access lines be equipped for equal access service. Staff noted that as of December 1, 1996, close to 100% of the access lines in Kansas were equipped for equal access service. Staff also stated interLATA interexchange carriers have been price deregulated for several years and quality of service has been consistently high as evidenced by the low number of service quality complaints received by the Commission since 1990. Staff also stated the FCC imposes no quality of service standards on interexchange carriers because competition among providers has insured customers receive high quality service. Staff also stated that a majority of service problems occur in either the originating or terminating local exchange carrier's networks and that recently established quality of service standards for local exchange carriers will monitor such problems.

9. To comply with the 1996 Kansas Act's directive to establish **minimum** quality of service standards, Staff proposed that the following quality assurance standards be established: (1) that interLATA interexchange carriers provide reasonably sufficient and efficient service to their customers as indicated by not

more than four bona fide quality of service complaints received by the Commission in a rolling twelve month period; (2) that upon receipt of more than four such complaints in a rolling twelve month period, the Commission will initiate a service investigation that may result in the imposition of fines, in accordance with Section 3(l) of the 1996 Kansas Act. Staff also proposed that telecommunications carriers that perform local exchange carrier (LEC) functions be subject to the LEC quality of service standards for that part of their network.

III. Findings & Conclusions

10. The Commission finds and concludes that Staffs recommendation is reasonable. The Commission finds that competition among interLATA interexchange carriers has resulted in high service quality. The Commission also finds and concludes that a majority of all service problems occur in either the originating or terminating local exchange carrier's networks and that recently established quality of service standards for local exchange carriers will monitor such problems. The Commission also finds and concludes that Staffs quality of service standards for interLATA interexchange carriers are reasonable. The Commission finds that interLATA interexchange carriers should provide reasonably sufficient and efficient service to their customers as indicated by not more than four bona fide quality of service complaints received by the Commission in a rolling twelve month period. The Commission further finds and concludes that upon receipt of more than four such complaints per year, the Commission shall initiate a service investigation that may result in the imposition of fines, in accordance with Section

3(l) of the 1996 Kansas Act. The Commission also finds and concludes that telecommunications carriers that perform local exchange carrier (LEC) functions will be subject to the LEC quality of service standards for that portion of their network.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT: Quality of service standards for all interLATA interexchange carriers are established as set forth above. Any party may file a petition for reconsideration of this order within fifteen days of the date this order is served. If service is by mail, service is complete upon mailing and three days may be added to the above time frame. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further order or orders as it may deem necessary. BY THE COMMISSION IT IS SO ORDERED.

ed DEC McKee, Chr.; Seltsam, Corn.; Wine, Corn. **ORDER**

McCONNELL
DIRECTOR

MD

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File name: 411780ks610.pdf

Haviland Telephone Company, Inc.
Line 610 – Functionality in Emergency Situations

As required in 47 C.F.R. § 54.313(a)(6) for all high cost recipients, which includes the Company, and as set forth in 47 C.F.R. § 54.202(a)(2), the following provides a detailed description demonstrating that the Company has the ability to remain functional in emergency situations, including a demonstration that 1) it has a reasonable amount of back-up power to ensure functionality without an external power source, 2) is able to reroute traffic around damaged facilities, and 3) is capable of managing traffic spikes resulting from emergency situations.

OVERALL RESPONSE TO EMERGENCY SITUATIONS: The Company has a comprehensive disaster recovery plan (also called a “continuity plan”) that was developed and implemented for the Company specifically to deal with emergencies. It has detailed, specific steps that are to be taken for each type of emergency.

POWER: In order to function in an emergency, the Company has a combination of batteries and emergency generators. Some locations have permanent emergency generators with fuel tanks; whereas, other locations require a portable generator to be brought to the location to recharge the on-site batteries. The company owns several portable generators that technicians can take out to recharge the batteries. For example, the company’s central offices have automatic stand-by generators to run the entire offices. The digital loop carrier (“DLC”) sites also have battery back-up.

REROUTING TRAFFIC AND REDUNDANCY: The Company has established 100% redundant E-911 trunks and SS-7 routes. In addition, the network was designed with redundancy, wherever possible, especially in the backbone network. Where it is not redundant, the Company has the ability to redirect most backbone traffic. In cases where there is no redundancy, it is due to the extreme cost of a 100% redundant network. For example, the loop to the customer location is typically not redundant, especially for residential customers. This is because it would not be cost effective to build totally separate facilities for the “last mile” to the customer.

MANAGING TRAFFIC SPIKES: The Company realizes that when a catastrophe happens, everyone immediately tries to contact friends and family to make certain they are all right. The Company has designed the network to have excess capacity on its backbone network. For example, on Mother’s Day, the company handles traffic without the customer receiving the “All Trunks Busy” message which demonstrates the Company’s ability to handle peak traffic spikes.

File name: 411780ks1010.pdf

Haviland Telephone Company, Inc.
Line 1010 – Voice Services Rate Comparability

As required in 47 C.F.R. § 54.313(a)(10), any recipient of high-cost support shall provide a letter certifying that the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice services, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The following provides the Company's support for Line 1010 - Description of Voice Service Rate Comparability.

As of January 1, 2017, the Company charges the following fixed voices prices:

Flat Rate Residential Service	\$17.00
State Residential Subscriber Line Charge	0.00
State Universal Service Charge Fee	\$1.53
Mandatory Extended Area Service	0.00
Residential Federal Subscriber Line Charge	<u>\$6.50</u>
Total Residential Fixed Voice Charges	<u>\$25.03</u>

Since the total for basic residential fixed voice that the Company charges, as shown above, is above the 2016 rate floor for voice services of \$22.49 and below the reasonable comparability benchmark for voice services of \$49.51, announced by the FCC Wireline Competition Bureau in the Public Notice released on February 14, 2017 (DA 17-167), the Company certifies that the pricing of its basic residential voice services is no more than \$49.51 and the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(10).

File name: 411780ks1030.pdf

Haviland Telephone Company, Inc.
Line 1030 – Broadband Comparability

In a December 2014 Order (FCC 14-90), paragraphs 119-123, the FCC created Section 54.313(a)(12) which requires recipients of High Cost Program and/or Connect America Fund support that are subject to broadband performance obligations to submit a broadband reasonable comparability rate certification.

The following provides the Company's support for Line 1020 - Description of Broadband Service Rate Comparability.

As of January 1, 2017, the Company charges the following residential broadband price, where available:

Download Speed	14Mbps
Upload Speed	1Mbps
Usage Allowance	Unlimited
TOTAL RESIDENTIAL	\$78.48

As shown above, the Company provides a 14 Mbps x 1 Mbps for \$78.48. Since the total for residential broadband that the Company charges, as shown above, is below the \$82.40 rate for 14 Mbps x 1 Mbps with the unlimited usage allowance computed using the FCC Reasonable Comparability Benchmark Calculator at <https://www.fcc.gov/general/reasonable-comparability-benchmark-calculator>, and since 14 Mbps x 1 Mbps give greater broadband speed than 10 Mbps x 1 Mbps, which is the reasonable comparability benchmark for broadband service announced by the FCC Wireline Competition Bureau in the Public Notice released February 14, 2017 (DA 17-167), the Company hereby certifies that it is in compliance with 47 C.F.R § 54.313(a)(12).

File name: 411780ks1210.pdf

**Haviland Telephone Company, Inc.
Line 1210 – Terms and Conditions for Lifeline**

Haviland Telephone Company Lifeline Terms and Conditions

The Lifeline Service Program (Lifeline), sponsored by the FCC is a program designed to maintain and preserve universal service by providing a reduction in the price of basic residential exchange service to qualifying low-income customers. The Company's voice lifeline plan includes unlimited local minutes-of-use within the toll-free calling area. The Company's voice lifeline plan does not include any free minutes-of-use for toll. The Company's broadband lifeline plan applies to broadband plans at minimum speeds of 10 Mbps download and 1 Mbps upload and a minimum data availability of 150 GB per month. In those areas where speeds at or above 10/1 download/upload speeds are unavailable, the highest performing speed will be provided, which must be at least 4/1 download/upload.

1. GENERAL

1. Lifeline is a federally funded reduction of basic local residential voice and broadband service. The Federal credit amount (CR) provided to Lifeline subscribers will be the maximum amount authorized by the FCC of \$9.25
 1. **As of January 1, 2015 Haviland Telephone offers standard priced broadband services only in conjunction with voice services. As such, the full Federal Lifeline credit amount will be applied towards residential voice service at this time.**
 2. Lifeline customers will also receive additional Lifeline Service reductions in intrastate local telephone service of \$7.77.
 3. In no event shall the Local Exchange access service rate be reduced below zero.
2. Local service for Lifeline customers may not be disconnected for nonpayment of toll charges.
 1. Toll Restriction Service will be provided to Lifeline customers at no charge.
 2. Lifeline customers are not required to accept Toll Restriction Service as a condition to avoid disconnection of local service for non-payment of toll.
 3. Lifeline customers are not required to pay a deposit in order to obtain local service if the customer voluntarily elects installation of Toll Restriction Service.
3. Partial payment from Lifeline customers will be applied first to local service charges and then to toll charges.
4. Lifeline customers will not be denied reestablishment of service on the basis that the customer was previously disconnected for non-payment of toll charges.
5. Lifeline will not be furnished on a Foreign Exchange service arrangement.
6. Lifeline customers will be required to remain with their service provider for a minimum period before they can transfer their benefit to another provider. This is called a benefit port freeze and allows Lifeline carriers to invest in high-quality, low-cost service offerings for Lifeline consumers. During the benefit port freeze, other Lifeline Program providers are forbidden from seeking/receiving Lifeline reimbursement for the customer. After the benefit port freeze period expires, the

customer may continue using the Lifeline benefit on a month-to-month basis or transfer their benefit to another provider. If the customer switches their Lifeline benefit to a different provider, another benefit port freeze period begins with the new provider. The benefit port freeze period is defined as follows:

1. Voice only – 60 days
 2. Voice with broadband (broadband does not meet the minimum service standards) – 60 days*
 3. Broadband only – 12 months
 4. Broadband with voice – (voice does not meet the minimum service standards) – 12 months*
 5. Bundle – (both voice and broadband meet the minimum service standards) – 12 months*
7. In limited situations, customers may be exempt from their benefit port freeze period and transfer their Lifeline benefit to a different provider. Before transferring a customer's benefit to another company during their port freeze period, the new provider must confirm that one of the exceptions applies. Customers are exempt from their benefit port freeze if:
1. They move (change their residential address),
 2. The service provider ceases operations, or otherwise fails to provide service,
 3. The service provider has imposed late fees greater than or equal to the monthly end-user charge for the supported service (e.g., the customer's monthly bill is \$20, and they've incurred late fees of \$21), or
 4. The service provider is found to be in violation of Lifeline Program rules and the subscriber is impacted by the violation.

2. ELIGIBILITY REQUIREMENTS

1. Lifeline will be provided for on (1) telephone line per household, at the customer's principal place of residence who have only one local exchange access line to his/her residential premises or dwelling place.* Verification of this requirement will be through self-certification.
2. Show that he/she is currently a recipient of benefits from one of the following public assistance programs:
 - Supplemental Nutrition Assistance Program (SNAP)
 - Medicaid
 - Supplemental Security Income (SSI)
 - Federal Public Housing Assistance (FHPA)
 - Veterans Pension & Survivors Pension Benefit
 - Bureau of Indian Affairs General Assistance,
 - Tribally Administered Temporary Assistance for Needy Families
 - Head Start Tribal Programs (only those meeting its income qualifying standard)
 - Food Distribution Program on Tribal Lands
3. Income Eligibility
A customer shall be eligible for the Lifeline Service Program if that customer's household annual income level is at or below 135% of the federal poverty level. Such customers may obtain a form from the Telephone Company suitable for self-

certification of income level and provide the completed form to the Company to begin service under the program. Proof of income is required. Acceptable documentation may include the prior year's federal, state, or tribal tax return, or other forms of income certification. Customers should contact the Company for specific details.

4. Certification

The customer will certify eligibility for Lifeline Service. Recertification is required annually or at any time the qualifying criteria for the customer changes.

Recipients of Lifeline Service must notify the Company when they no longer qualify for Lifeline Service. Upon receipt of the notification, the Company will discontinue Lifeline Service.

If the Company discovers that conditions exist that disqualify the recipient of Lifeline Service, local service will be billed at the full rate. The customer will be billed retroactively either to the date Lifeline Service commenced or the date the recipient no longer qualified for the service, not to exceed twelve (12) months.

*A residential premises or dwelling place is that location where a customer resides, even if such residential premises or dwelling place is only a single room. Lifeline will not be provided if the customer has access to other local exchange telephone service within the residential premises or dwelling place, provided/owned by himself/herself or owned/provided by others. However, it can be determined by the Telephone Company that access to other existing local exchange telephone service owned/provided by others is virtually denied, or is inaccessible to the customer, then Lifeline Service will be provided.

Revised 12/02/2016

File name: 411780ks3010.pdf

Haviland Telephone Company, Inc.
Line 3010 – Certification of Public Interest Obligations

As required in 47 C.F.R. § 54.313(f)(1)(i), any rate-of-return ETC receiving support must certify it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time.

With this document, the Company hereby certifies that it has taken reasonable steps as summarized in the FCC rules and regulations shown on the following pages to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

CERTIFICATION: The Company certifies that it is in compliance with the FCC Rules and Regulations and all appropriate documents are being filed as required by 47 C.F.R. § 54.313(f)(1)(i). The certification by an officer of the Company is included as part of the overall certification for the Form 481, which includes all attachments, and is made by an officer of the Company whose responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients. The overall Form 481 certification is made that to the best of the officer's knowledge, the information reported on the Form 481, including attachments, is accurate.

Primary FCC Orders Relating to “Reasonable Requests” for Broadband Service

In its 2011 *USF/ICC Transformation Order*¹ the Commission required rate-of-return carriers receiving Universal Service Fund (USF) support to provide their customers with “at least the same initial minimum level of broadband service as those carriers who receive model-based support”² Recognizing RLECs’ generally small size, however, the Commission determined these carriers “should be provided greater flexibility in edging out their broadband-capable networks in response to consumer demand.” More specifically, the Commission stated that, “[u]pon receipt of a reasonable request for service, carriers must deploy broadband to the requesting customer within a reasonable amount of time.”³

In its 2012 *Third Order on Reconsideration*,⁴ the Commission clarified that its rules “provide sufficient flexibility to take into account any unique circumstances that may impact the ability of rate-of-return companies to extend broadband to their customers, including backhaul costs.”⁵

Later, in its 2014 *Seventh Order on Reconsideration*, the Commission acknowledged that there remained “some ambiguity” as to what would constitute an unreasonable request for service.⁶ It accordingly included a *Declaratory Ruling* to clarify matters.⁷

The *Declaratory Ruling* first suggests that rate-of-return carriers evaluating a request to extend broadband service should consider:

¹ See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17663 (2011) (*USF/ICC Transformation Order*).

² *Id.* ¶ 206.

³ *Id.* ¶ 208.

⁴ See *Connect America Fund et al.*, WC Docket No. 10-90, *et. al.*, Third Order on Reconsideration, 27 FCC Rcd. 5622 (2012) (*Third Order on Reconsideration*).

⁵ *Id.* ¶ 46.

⁶ *Connect America Fund*, WC Docket No. 10-90, *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 29 FCC Rcd. 1175 (2014) ¶ 64 (*Seventh Order on Reconsideration*).

⁷ *Id.* ¶ 59.

whether it would be reasonable to make the necessary upgrades in light of anticipated end-user revenues from the retail provision of broadband service and other sources of revenues, including but not limited to federal or state universal service funding projected to be available under current rules. In considering end-user revenues, carriers should take into account the reasonable comparability benchmark for broadband services. If the incremental cost of undertaking the necessary upgrades to a particular location exceed the revenues that could be expected from that upgraded line, a request would not be reasonable.⁸

The Declaratory Ruling then specifically relates determination of unreasonable requests to the \$250/line cap on total high cost support imposed by the 2011 USF/ICC Transformation Order:

[A] request is not reasonable if it would require a carrier to undertake new network upgrades to install new backhaul facilities or to replace existing copper lines to the home with fiber merely for the purpose of newly providing broadband service in study areas where total support already is subject to the \$250 per line monthly cap. Moreover, we declare that a request is not reasonable if it would require a carrier to undertake new network upgrades to newly provide broadband service to requesting customers if that would cause total monthly support that presently is under the \$250 cap to exceed the cap⁹

The Commission also made clear a rate-of-return carrier has no obligation to extend broadband-capable infrastructure in any census block that is served by an unsubsidized competitor that meets the Commission's current performance standards.¹⁰

At the time the *Declaratory Ruling* was issued, the Commission was also considering whether to revise its broadband performance obligations to require higher speeds, such as 10Mbps downstream.¹¹ The Commission reiterated, however, that if minimum speed requirements were increased, a rate-of-return carrier would only be required to provide the higher speed service if the request was reasonable:

In determining whether a particular upgrade is cost effective, the carrier should consider not only its anticipated end-user revenues from the services to be offered over that network, both voice and retail broadband internet access, but also other sources of support, such as federal and, where available, state universal service funding. Under our proposal to increase the minimum downstream speed threshold, we thus would not expect a rate-of-return carrier immediately to upgrade its entire existing infrastructure

⁸ *Id.* ¶ 65.

⁹ *Id.* ¶ 67.

¹⁰ *Id.* ¶ 68.

¹¹ *Id.* ¶ 138.

to provide 10 Mbps downstream and 1 Mbps upstream (10 Mbps/1 Mbps) to all current customers. Rather, we propose that rate-of-return carriers would take into account any revised speed standards when considering whether and where to upgrade existing plant in the ordinary course of business and would report on progress toward this goal in preparing annual updates to their five-year service improvement plans.¹²

In a *Report and Order* released December 18, 2014 the Commission adopted several measures to address non-compliance with its CAF deployment obligations.¹³ Noting that rate-of-return carriers were required to build out their networks only on “reasonable request,” the Commission determined that non-compliance issues for RLECs should be dealt with on a case-by-case basis.¹⁴ (This differs significantly from the strict milestone-based measures applicable to other eligible telecommunications carriers (ETCs).)

The Commission further clarified that rate-of-return carriers “should report any requests that are deemed unreasonable as unfulfilled requests in their section 54.313 annual reports.”¹⁵ USAC is expected to verify that rate-of-return carriers have sufficient evidence to demonstrate that any unfulfilled requests were in fact unreasonable.¹⁶ To the extent USAC determines that insufficient evidence to support a denial of service, such finds shall be reported as “other matters.”¹⁷

¹² *Id.* ¶ 144.

¹³ *Connect America Fund*, WC Docket No. 10-90, *ETC Annual Reports and Certifications*, WC Docket No. 14-58, *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Obsolete ILEC, Regulatory Obligations that Inhibit Deployment of Next-Generation Networks*, WC Docket No. 14-192, Report and Order, FCC 14-190 (rel. Dec. 18, 2014) (*Report and Order*).

¹⁴ *Id.* ¶ 143.

¹⁵ *Id.* ¶ 153.

¹⁶ *Id.*

¹⁷ *Id.*